

## **REMARKS**

Claims 1-18 are pending in the present Application. Claims 9-18 stand withdrawn as being directed to a non-elected invention. Claims 19 and 20 are added.

Support for the amendment to claim 1 is found on page 7, lines 5-6 of the Specification. Newly added claims 19 and 20 are supported by the Specification at page 7, lines 7-20. No new matter is added with this Amendment.

Claims 1-18 are subject to a restriction requirement as follows:

Group I - Claims 1-8; and

Group II – Claims 9-18.

Applicants hereby affirm their election of Group I, claims 1-8 with traverse. Claims 9-18 do not present any additional searching burden. Any search of the composition will also include a search of methods of using that composition. The official action stated that the present composition could be used in a different process such as electroless plating. Applicants respectfully traverse. Electroless plating requires a driving force for copper plating other than electric current. Such driving force is typically supplied by a reducing agent. No such reducing agent is required by the present claims. Applicants respectfully request that claims 9-18 be rejoined. In the event that claims 9-18 are not rejoined at this time, Applicants trust that, as claims 1-8 and 9-18 are related as composition and method of use, claims 9-18 will be rejoined upon the allowance of claims 1-8 under *In re Ochiai* as long as they are of the same scope.

Applicants confirm that the claim interpretation taken in the Official Action is correct. Applicants defined “random copolymer” in the Specification as follows: “By “random copolymer” it is meant a copolymer having its repeat units randomly distributed along the copolymer chain.” See the Specification at page 7, lines 5-6. The formula presented in claim 3, and as discussed in the Specification at page 7, lines 7-20, is merely a convenient shorthand for a polymer composed of two different monomer units. It is clear from reading the Specification, particularly at page 7, lines 2-20, that these polymers are random copolymers and not block copolymers.

Claims 1-3 and 6-8 have been rejected under 35 USC §102(e) as being anticipated by Grandikota et al. (U.S. 2002/0112964). Applicants respectfully traverse.

Claim 4 has been rejected under 35 USC §102(e) as being anticipated by Grandikota et al. (U.S. 2002/0112964) as evidenced by the Rosen article. Applicants respectfully traverse.

As both rejections rely on the same primary reference, they will be argued together.

The Grandikota patent application does not anticipate Applicants' claimed invention. The Grandikota patent application fails to teach or suggest *random* ethylene oxide / propylene oxide copolymers that are purely random. In paragraph 0020, this patent application only discloses copper plating baths containing "random/block copolymers of ethylene oxide and propylene oxide." Such random/block copolymers are copolymers having random placement of *blocks* of each monomer unit, i.e. blocks of ethylene oxide and blocks of propylene oxide are randomly distributed throughout the copolymer chain. Such a polymer is quite different from the completely random copolymers as claimed by Applicant. Block copolymers are known in the art to have considerable variation in terms of the length of each block and in the number of blocks. See, e.g., Odian, Principles of Polymerization, 3<sup>rd</sup> edition, John Wiley & Sons, New York, 1991, page 143; see also Hiemenz, Polymer Chemistry, Marcel Dekker Inc., New York, 1984, page 12. Applicants submit that this reference does not anticipate their claimed invention and respectfully request that this rejection be withdrawn.

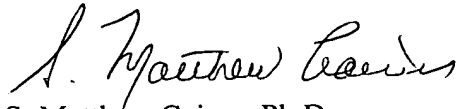
Claim 5 has been rejected under 35 USC §103(a) as being unpatentable over Grandikota et al. (U.S. 2002/0112964) in view of Egli et al. (US 2002/0153260). Applicants respectfully traverse.

The Grandikota patent application is discussed above. Egli et al. are cited for teaching the molecular weights of ethylene oxide / propylene oxide ("EO/PO") copolymers. However, the Egli patent fails to fill the deficiencies of Grandikota et al. The Egli patent fails to disclose or suggest the type of EO/PO copolymers employed. Thus, nothing in this combination teaches or suggests a copper plating bath containing one or more poly(alkylene oxide) random copolymers comprising as polymerized units two or more alkylene oxide monomers, wherein the alkylene oxide monomers are randomly distributed along the copolymer chain and having a molecular

weight of 500 to 20,000. Applicants submit that the Examiner has not made out a prima facie case of obviousness and respectfully request this rejection be withdrawn.

In view of the foregoing, favorable reconsideration in the form of a notice of allowance is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. Matthew Cairns". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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